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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

16 CHARLOTTE BOWNES; JOSEPH
17 LAGRECA; JESSICA NAUMANN; and
CHRISTOPHER GOODIN, individually and
on behalf of all others similar situated,

Plaintiffs,

V.

INTERNATIONAL GAME TECHNOLOGY
PLC; MGM RESORTS INTERNATIONAL;
BALLY'S CORPORATION; PENN
ENTERTAINMENT, INC.; STATION
CASINOS, LLC,

Defendants.

Case No.: 3:24-cv-00528-ART-CSD

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR (1)
PLAINTIFFS TO FILE AMENDED
COMPLAINT; (2) DEFENDANTS TO
RESPOND TO THE AMENDED
COMPLAINT; AND (3) SET BRIEFING
SCHEDULE ON DEFENDANTS'
RESPONSIVE MOTION(S)**

(THIRD REQUEST)

Pursuant to LR IA 6-1, Plaintiffs Charlotte Bownes, Joseph Lagreca, Jessica Naumann, and Christopher Goodin, on one hand, and Defendant International Game Technology, PLC (IGT PLC)¹, on the other hand, by and through their respective undersigned attorneys of record (collectively, the “Parties”), hereby stipulate and agree subject to the Court’s approval to extend the time for (1) Plaintiffs to file an amended complaint, (2) Defendants to respond to the amended complaint, and (3) set a briefing schedule on Defendants’ responsive motion(s). The current deadline for defendants, including IGT PLC, to respond is March 3, 2025. This is the third request for extension concerning this deadline.

1. On November 21, 2024, Plaintiffs filed their Complaint (ECF No. 1) against defendants, including Defendant IGT PLC (“Defendant”).
2. On November 25, 2024, Plaintiffs mailed a copy of the Complaint and Summons to a registered agent associated with IGT PLC (ECF No. 11).
3. On December 16, 2024, the Court approved an extension of time (ECF No. 19).
4. On January 22, 2025, the Court approved a second extension of time (ECF No. 26).
5. The current deadline for all defendants to respond to the Complaint (ECF No. 1) is March 3, 2025 (ECF No. 26).
6. Defendant contacted Plaintiffs to discuss its position that IGT PLC is an improperly named party. After conducting a meet and confer process, Plaintiffs have indicated that they intend to dismiss IGT PLC.
7. The other named defendants believe they are improperly named and counsel for proposed substitute defendants has contacted Plaintiffs. These discussions are ongoing and progressing.
8. Plaintiffs have stated that as a result of the meet and confer process they intend to amend the complaint. Counsel for IGT and counsel for the substitute defendants that have conferred with Plaintiffs have agreed to accept service of the amended complaint.
9. Subject to the Court’s approval, the Parties have agreed to the following schedule:

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28 ¹By entering into this stipulation, Defendant IGT PLC does not waive any arguments related to jurisdiction or any initial motion defenses.

- 1 • Plaintiffs shall file and serve their amended complaint on March 17, 2025;
- 2 • Defendants shall file and serve any responsive motion(s) on April 17, 2025;
- 3 • Plaintiffs shall file and serve any opposition to Defendants' responsive
4 motion(s) on May 19, 2025; and
- 5 • Defendants shall file and serve any reply(s) in support of their responsive
6 motion(s) on June 2, 2025.

7 10. During the requested extension, the parties intend to continue to finalize their meet and
8 confer process regarding the named defendants. The requested extension is in the
9 interest of judicial economy as continued conferral between the parties may eliminate
10 or limit the need for certain motion practice. Further, due to the complexities of the
11 issues raised in this matter and the number of parties involved in the action, the above
12 briefing schedule will allow any additional parties to get up to speed.

13 11. Good cause exists to grant this stipulation and it is submitted in good faith, is not
14 interposed for delay, and is not filed for an improper purpose.

15 DATED: February 14, 2025

15 DATED: February 14, 2025

16 /s/ Tyler K. Somes (with permission)

16 /s/ Carrie Dettmer Slye

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23 *Attorneys for Defendant International Game
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24 IT IS SO ORDERED.

25 UNITED STATES DISTRICT JUDGE /
 26 UNITED STATES MAGISTRATE JUDGE
 27 Dated:
 28